

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

QUAN SHUN CHEN

No. 18 CR 478

Judge Edmond E. Chang

**MOTION FOR ENTRY OF UNOPPOSED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an unopposed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant with making false statement on his tax forms, in violation of Title 18, United States Code, Section 1343.
2. The discovery to be provided by the government in this case includes information relating to other taxpayers, which cannot be extricated from defendant's information. For instance, although reports can be redacted, the grand jury transcript relevant to this case addresses three indictments together and cannot be redacted without making the transcript difficult to understand. Thus, the unrestricted dissemination of certain information could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendant, who does not oppose the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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